

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

COMPLAINT ON CHARGES FOR THE
BULK PARCEL RETURN SERVICE

DOCKET NO. C99-4

NOTICE BY UNITED PARCEL SERVICE OF
INTERVENTION AS A PARTY UNDER
COMMISSION RULE 20
(September 14, 1999)

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COMMISSION RULE 20

Pursuant to Section 20 of the Commission's Rules of Practice, 39 C.F.R. § 3001.20, United Parcel Service ("UPS") hereby gives notice of its intervention as a party in this proceeding and states the following in support of its intervention:

1. UPS provides delivery services throughout the United States via air and ground operations. UPS also provides an international delivery service.
2. UPS competes with the United States Postal Service and is affected by the application of the Postal Reorganization Act of 1970, as amended, 39 U.S.C. § 101 et seq., in all areas where the Postal Service competes with private enterprise, including UPS. These areas include not only parcel delivery services, but also ancillary services which are often purchased along with the basic delivery service. In particular, UPS provides a parcel return service similar to that provided by the Postal Service which is at issue in this case.

3. UPS is also a substantial user of postal services, especially First Class Mail.

4. As a competitor of the Postal Service and as a user of postal services, UPS will be affected by and is interested in the matters raised by the Complainant in this proceeding. In particular, UPS has an interest in insuring that any changes which may result from this proceeding comply with the Postal Reorganization Act, including the factors set forth in Sections 3622 and 3623 of the Act.

5. UPS requests a hearing and presently intends to actively participate in the hearings in this proceeding.

WHEREFORE, United Parcel Service gives notice of its intervention as a full party in this proceeding

Respectfully submitted,

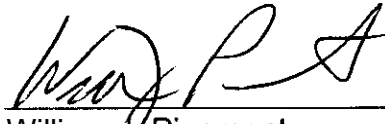


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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.

A handwritten signature in black ink, appearing to read 'W. J. Pinamont', is written over a horizontal line.

William J. Pinamont
Attorney for United Parcel Service

Dated: September 14, 1999
Philadelphia, Pa.